

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STANLEY BOMANI CRUMPTON	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. 02-2873
	:	
v.	:	
	:	
JOHN E. POTTER, POSTMASTER GENERAL	:	
U.S. POSTAL SERVICE	:	
EASTERN AREA AGENCY	:	
	:	
Defendant.	:	

**ORDER**

AND NOW, this        day of        , 2002, upon consideration of the Defendant's Motion for Extension of time, and the Response, if any, the Motion is GRANTED. The United States Postal Service shall file its Response to the Complaint on or before August 14, 2002.

BY THE COURT:

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KELLY, J.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STANLEY BOMANI CRUMPTON	:	
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JOHN E. POTTER, POSTMASTER GENERAL	:	
U.S. POSTAL SERVICE	:	
EASTERN AREA AGENCY	:	
	:	
Defendant.	:	

**DEFENDANT'S MOTION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

The Defendant, John E. Potter, Postmaster General, U.S. Postal Service, hereby requests, pursuant to Fed. R. Civ. P. 6(b), that he be granted an extension of thirty days in which to respond to the Complaint. The reasons for this Motion are more fully set forth in the attached Memorandum of Law which is incorporated herein by reference.

Respectfully submitted,

PATRICK L. MEEHAN  
United States Attorney

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JAMES G. SHEEHAN  
Assistant United States Attorney  
Chief, Civil Division

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SUSAN SHINKMAN  
Assistant United States Attorney

OF COUNSEL:

Jennifer Breslin  
Attorney  
Philadelphia Field Office  
U.S. Postal Service Law Department  
615 Chestnut Street  
P.O. Box 40595  
Philadelphia, PA 19197-0595

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	:	
Defendant.	:	

**DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF MOTION  
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

I. INTRODUCTION

\_\_\_\_\_The Plaintiff, Stanley Bomani Crumpton, has filed a Complaint against John E. Potter, Postmaster General, U.S. Postal Service ("USPS"), alleging discrimination against him as an employee. The USPS is filing this Motion to request an additional 30 days in which to respond to the Complaint.

II. ARGUMENT

\_\_\_\_\_The response by the USPS to this Complaint is currently due to be filed on July 15, 2002. The USPS has not completed its review of the record and needs an additional period, not to exceed thirty days, in which to file and serve its response. This is the first request for an extension of time which has been requested by the USPS.

The Plaintiff has filed this Complaint pro se and there is no telephone number listed on his pleadings. Accordingly, the

USPS has not been able to ascertain whether the Plaintiff is in agreement with this request.

CONCLUSION

\_\_\_\_\_For all of the above stated reasons, the USPS respectfully requests that its Motion for an Extension of Time be granted.

Respectfully submitted,

PATRICK L. MEEHAN  
United States Attorney

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JAMES G. SHEEHAN  
Assistant United States Attorney  
Chief, Civil Division

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Defendant's Motion for Extension of Time to Respond to Complaint was mailed postage pre-paid, this 3rd day of July 2002, to the following:

Stanley Bomani Crumpton, pro se  
5 Greenfield Drive  
New Castle, DE 19720

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SUSAN SHINKMAN